

June 26, 2008

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State Water Resources Control board  
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Sent via electronic mail to: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

**Subject: SRSCD Comment Letter – Statewide General Permit for  
Landscape Irrigation Uses of Recycled Water**

Dear Ms. Townsend,

The Sacramento Regional County Sanitation District (SRCS D) appreciates the opportunity to submit comments on the scope of the Statewide General Permit for Landscape Irrigation (General Permit). We strongly advocate that the General Permit be developed through a stakeholder process. It is very important for this effort to establish a statewide general permit that expedites the permitting process to help increase the use of water recycling in the State, while preventing adding to the regulatory burden or requiring duplicative efforts or permits. This concept is clearly specified in AB 1481.

The SRCS D provides wastewater conveyance, treatment, and disposal services to over 1.3 million residents in the Sacramento metropolitan area. In addition, SRCS D is doing its part to protect the environment and extend the local and State water supplies by producing recycled water for landscape irrigation purposes in our area. As we continue to evaluate locally and statewide the feasibility of expanding our water recycling efforts to help meet the needs of the State's water demands, the need for good legislation and regulations that encourage and promote water recycling projects becomes more critical.

We support the comments being submitted by the California WaterReuse Association (WaterReuse) and the Central Valley Clean Water Association (CVCWA). These agencies have submitted comprehensive lists of comments on the scope for General Permit, so we will not repeat their comments in this letter. However, we would like to summarize some of the important issues:

- The General Permit should not be a deterrent to the operation of existing projects and to the expansion of new recycled water projects.
- The final outcome of the General Permit must be simple and clear to meet its original intent—which is to provide a uniform interpretation of State standards to ensure the safe, reliable use of recycled water for landscape irrigation, while expediting the permitting process.
- The State Water Board should develop a stakeholder group to address various issues that arise in the development of the permit. The group should include both federal and state agencies, as well as groundwater management agencies and water replenishment districts, water recyclers, purveyors, and users.

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- Duplicative permits should not be required. The General Permit should either completely replace all types of recycled water permits or should only be required when coverage is not available under another permit.
- The list of acceptable uses is incomplete; it must include landscape irrigation of commercial and industrial sites, etc.
- Incidental runoff from both surface water impoundments and irrigation sites continue to be a major permitting issue and impediment to recycled water use and should be addressed in this permit. Different options for permitting incidental runoff (such as BMPs, coverage under stormwater permits, etc.) should be explored through this process.
- A water recycler – whether a producer, a purveyor, or a user - should be allowed to choose which permit they desire coverage under. If a producer has multiple permits (i.e. a WDR/NPDES permit) – it needs to be clearly delineated where that permit is applicable and where it ends. Ideally, between the permits, there should not be any overlap in regulatory requirements.
- Emerging contaminants are a concern for all types of water due to the unknowns surrounding the fate of these contaminants and very little information is known as to the impacts or toxicity of many of these constituents. As such, we suggest the findings of the General Permit should discuss the issues surrounding emerging contaminants. However, where numeric water quality objectives are not available, the General permit should not include specific requirements addressing these contaminants.
- When use of recycled water has no greater threat to beneficial uses than other available supplies (groundwater, surface water, potable water) etc., the recycled water use should meet the antidegradation provisions in Resolution No. 68-16. If landscape irrigation is being irrigated properly, anti-degradation should not be an issue.
- The fee structure should not be a disincentive to the expansion of recycled water projects.

We appreciate the opportunity to comment in this early phase of the General Permit development and strongly encourage the State Water Resources Control Board to use a stakeholder process in developing this permit. The creation of a general permit that meets its original intent will be a tremendous step towards increasing predictability and consistency in the permitting process and increasing California's use of this sustainable and safe water supply.

Sincerely,



Wendell H. Kido  
District Manager